

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

AMERICAN AIRLINES, INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:23-cv-00860-P
	§	
SKIPLAGGED, INC.,	§	
	§	
Defendant.	§	

**DEFENDANT SKIPLAGGED, INC.’S SUPPLEMENTAL RULE 26(a)(3) PRETRIAL
DISCLOSURES**

Defendant Skiplagged, Inc. (“Skiplagged”) hereby submits its Supplemental Pretrial Disclosures in accordance with Federal Rule of Civil Procedure 26(a)(3). Skiplagged reserves the right to amend or supplement its pretrial disclosures to address new claims as allowed by the Federal Rules of Civil Procure and the Court.

Fed. R. Civ. P. 26(a)(3)(A)(i). The name and, if not previously provided, the address and telephone number of each witness – separately identifying those the party expects to present and those it may call if the need arises;

RESPONSE: Skiplagged refers Plaintiff to Skiplagged’s Supplemental Potential Witness List, attached hereto as Exhibit A. “Probable” means Skiplagged expects to present the witness. “Possible” means Skiplagged may call this witness if the need arises. Though attorneys’ fees issues are resolved post-judgment, in an abundance of caution, Skiplagged supplementals its previous pretrial disclosures to add the previously disclosed experts on attorneys’ fees. Skiplagged reserves the right to call, examine and/or present evidence from any witnesses designated by Plaintiff in this case, as well as rebuttal or impeachment witnesses, as needed. Skiplagged also reserves the

right to modify, amend, or supplement this witness list or to change any witness from “probable” to “possible” or vice versa.

Dated: August 27, 2024.

Respectfully submitted,

/s/ William L. Kirkman

William L. Kirkman

Texas Bar No. 11518700

Preston B. Sawyer

Texas Bar No. 24102456

KIRKMAN LAW FIRM, PLLC

201 Main Street, Suite 1160

Fort Worth, Texas 76102

Telephone: (817) 336-2800

Facsimile: (817) 887-1863

billk@kirkmanlawfirm.com

prestons@kirkmanlawfirm.com

/s/ Abigail R.S. Campbell

Aaron Z. Tobin

Texas Bar No. 24028045

Kendal B. Reed

Texas Bar No. 24048755

Abigail R.S. Campbell

Texas Bar No. 24098759

**CONDON TOBIN SLADEK THORNTON NERENBERG,
PLLC**

8080 Park Lane, Suite 700

Dallas, Texas 75231

Telephone: (214) 265-3800

Facsimile: (214) 691-6311

atobin@condontobin.com

kreed@condontobin.com

acampbell@condontobin.com

/s/ Darin M. Klemchuk

Darin M. Klemchuk

Texas Bar No. 24002418

KLEMCHUK PLLC

8150 North Central Expressway, 10th Floor

Dallas, Texas 75206

Telephone: (214) 367-6000

Facsimile: (214) 367-6001

Darin.klemchuk@klemchuk.com

Attorneys for Defendant, Skiplagged, Inc.

CERTIFICATE OF SERVICE

On August 27, 2024, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the CM/ECF system which will send a notice of electronic filing to all counsel of record. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Abigail R.S. Campbell
Abigail R.S. Campbell